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May 21, 2021

So ordered,
/s/ Alvin K. Hellerstein
Alvin K. Hellerstein
5/24/21

BY ECF

The Honorable Alvin K. Hellerstein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Valencia Rocha et al., 21 Cr. 236 (AKH)

Dear Judge Hellerstein:

I represent Charles Burrill in the above-referenced matter, having been recently appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A on April 13, 2021.

Our motion to suppress is to be filed today. I write, without objection from the Government to request an extension until Tuesday, May 25, 2021.¹ I have a trial scheduled to begin before the Honorable Paul A. Engelmayer on June 2, 2021. Trial preparation has consumed much of my time recently. As such, an extra few days to file Mr. Burrill’s motion to suppress is needed.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti

¹ Should the Court grant this application, the Government requests until June 15, 2021 to file its opposition.